

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NORTH DAKOTA

In re:

Chapter 7
Bky. No. 24-30167

Pro-Mark Services, Inc.,

Debtor.

Erik A. Ahlgren, as Chapter 7 Trustee of
Bankruptcy Estate of Pro-Mark Services, Inc.,
as Administrator of the Pro-Mark Services,
Inc. Employee Stock Ownership Plan, and as
Trustee of the Pro-Mark Services, Inc.
Employee Stock Ownership Trust,

Adv. No. 24-07014

Plaintiff,

**NOTICE OF APPEARANCE &
REQUEST FOR NOTICE**

v.

Connie Berg, Kyle Berg, Connie Berg
Revocable Living Trust, Kyle R. Berg
Revocable Living Trust, Chad DuBois,
Mandy Grant, and Miguel Paredes,

Defendants.

PLEASE TAKE NOTICE that, pursuant to Bankruptcy Rule 9010(b), Carlos A. Alonso Gayon, of the law firm of Greenberg Traurig, LLP hereby appears in the above-captioned bankruptcy case as counsel for Erik A. Ahlgren, as Chapter 7 Trustee of Bankruptcy Estate of Pro-Mark Services, Inc., and as Administrator of the Pro-Mark Services, Inc. Employee Stock Ownership Plan, and as trustee of the Pro-Mark Services, Inc. Employee Stock Ownership Trust, and requests that copies of all notices and pleadings given or filed in this case be given and served upon the undersigned at the contact information below.

Carlos A. Alonso Gayon
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PLEASE TAKE FURTHER NOTICE that the foregoing demand includes not only the notices and papers referred to in the Bankruptcy Rules specified above but also includes, without limitation, any notice, application, complaint, demand, motion, petition, pleading or request, whether formal or informal, written or oral, and whether transmitted or conveyed by mail, delivery, telephone, telegraph, telex, or otherwise filed or made with regard to the referenced cases and all proceedings therein.

PLEASE TAKE FURTHER NOTICE that neither this Notice of Appearance nor any subsequent appearance, pleading, claim or suit is intended to waive (i) any right to have final orders in non-core matters entered only after de novo review by a district court judge; (ii) any right to trial by jury in any proceeding so triable herein, or in any case, controversy or proceeding related hereto; (iii) any right to have the reference withdrawn by the District Court in any matter subject to mandatory or discretionary withdrawal; or (iv) any other rights, claims, actions, defenses, set-offs or recoupments, in law or in equity, all of which rights, claims, actions, defenses, set-offs and recoupments are expressly reserved.

GREENBERG TRAURIG, LLP

Dated: October 3, 2024

/e/ Carlos A. Alonso Gayon

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*Counsel for Erik A. Ahlgren, as Chapter 7
Trustee of Bankruptcy Estate of Pro-Mark
Services, Inc., and as Administrator of the
Pro-Mark Services, Inc. Employee Stock
Ownership Plan, and as trustee of the
Pro-Mark Services, Inc. Employee Stock
Ownership Trust*

CERTIFICATE OF SERVICE

I hereby certify that on October 3, 2024, I electronically filed the foregoing **Notice of Appearance & Request for Notice** with the Clerk of the Court using the CM/ECF system which will send notification of such filing to all parties of record.

/e/ Carlos A. Alonso Gayon

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